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5 Counsel for Defendant
6 JUAN GONZALEZ

7 UNITED STATES DISTRICT COURT
8 NOTHERN DISTRICT OF CALIFORNIA
9 OAKLAND DIVISION
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 JUAN GONZALEZ,

15 Defendant
16

Case No.: CR 21-311 YGR

UNOPPOSED MOTION AND
[PROPOSED] ORDER TO CONTINUE
DATE FOR SELF SURRENDER

17 Defendant Juan Gonzalez respectfully requests that the date by which he must surrender
18 to begin serving his sentence be extended from February 14, 2024 to April 3, 2024. Mr.
19 Gonzalez is requesting the additional time to work and save money to pay his portion of his rent
20 and other costs (including care of his pets) while he is in custody so that he can return to his
21 residence when he completes his sentence. Given that he works in construction, the winter has
22 been slow.
23

24 Undersigned defense counsel has conferred with counsel for the government, who does
25 not object to this request. Undersigned counsel has also confirmed that Mr. Gonzalez's Pretrial
26 Services Officer does not object to this request; she further confirmed that Mr. Gonzalez is in
27 full compliance with his conditions of release.
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Dated: January 23, 2024

Respectfully Submitted:

Law Office of Adam Pennella

/s/

Adam Pennella


Counsel for Juan Gonzalez

~~[PROPOSED]~~ ORDER

Good cause having been shown, it is hereby ORDERED that defendant Juan Gonzalez shall surrender for service of sentence at the institution designated by the Bureau of Prisons on April 3, 2024 (no later than 2:00 p.m.).

SO ORDERED.

Dated: January 24, 2024


Honorable Yvonne Gonzalez Rogers
United States District Court Judge